



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
<http://www.epa.gov/region08>

September 28, 2004

Ref: 8ENF-T

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

C T Corporation System
Registered Agent for Continental Resources, Inc.
40 W. Lawrence - Suite A
P.O. Box 1166
Helena, MT 59624

Re: UNDERGROUND INJECTION
CONTROL (UIC)
Proposed Administrative Order and
Opportunity to Request a Hearing
(Complaint)

Dear Registered Agent:

The enclosed document is a Proposed Administrative Order and Opportunity to Request a Hearing (Complaint) ("Order") for violations of the Safe Drinking Water Act ("SDWA"). Please have Continental Resources, Inc. ("Continental") carefully read the Order soon, since it describes Continental's rights and responsibilities in this matter as well as EPA's authority, the factual basis of the violations, and the background for the proposed penalties. Also enclosed is a copy of the Rules of Practice that govern these proceedings, the required Public Notice associated with this Order and, in case Continental meets the criteria, an information sheet about the Small Business Regulatory Fairness Act.

Continental is required to take action within 30 calendar days of your receipt of this letter to avoid the possibility of having a default judgment entered against Continental that could impose the penalty amount proposed in the Order.

Whether or not Continental requests a hearing, we encourage an informal conference with EPA concerning the alleged violations in an effort to negotiate a settlement. Continental may wish to appear at an informal conference and/or be represented by legal counsel. To arrange for such a conference, Continental should contact Jim Eppers, Enforcement Attorney, Legal Enforcement Program, at the number provided below. Request for such a conference does not extend the thirty (30) day period during which a request for hearing must be submitted.



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Public Notice of EPA's Order and the opportunity to provide written comments on the Order is being provided pursuant to section 1423 (c)(3)(B) of the SDWA, 42 U.S.C. § 300h-2(c)(3)(B). Should a hearing be held, any person who comments on the Order has a right to participate in the hearing.

If Continental has technical questions relating to this matter, the person most knowledgeable on my staff is Carol Lee Bowden, UIC Enforcement Team, Technical Enforcement Program, at (303) 312-6485. For all legal questions, the person most knowledgeable on my staff is Jim Eppers at (303) 312-6893. Ms. Bowden and Mr. Eppers can also be reached at the following addresses:

Carol Lee Bowden (Mail Code 8ENF-UFO)
U.S. EPA Region 8
999 18th Street, Suite 300
Denver, Colorado 80202-2466, or

Jim Eppers (Mail Code 8ENF-L)
Enforcement Attorney
U.S. EPA Region 8
999 18th Street, Suite 300
Denver, Colorado 80202-2466

We urge Continental's prompt attention to this matter.

Sincerely,

Michael T. Risner for/

Carol Rushin
Assistant Regional Administrator
Office of Enforcement, Compliance
and Environmental Justice

Enclosures:

Proposed Administrative Order
and Opportunity to Request Hearing
40 C.F.R. Part 22
Public Notice
U.S. EPA Small Business Resources Fact Sheet

cc: Ray K. Eder, Chairman (with all enclosures), Fort Peck Tribal Executive Board
Deb Madison, Environmental Program Manager (with all enclosures),
Assiniboine & Sioux Tribes
Harold Hamm, President (with all enclosures), Continental Resources, Inc.

IN THE MATTER OF)	Docket No. SDWA-08-2004-0058
)	
Continental Resources, Inc.)	PROPOSED ADMINISTRATIVE
302 N. Independence St., Suite 206)	ORDER AND OPPORTUNITY
P.O. Box 1032)	TO REQUEST A HEARING
Enid, Oklahoma 73701)	(COMPLAINT)
)	
Respondent.)	
)	
Located on the Fort Peck Indian Reservation,)	
Montana)	

1. This is a civil administrative action issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (“EPA”) by section 1423(c) of the Safe Drinking Water Act (“Act”), 42 U.S.C. § 300h-2(c). The Administrator has properly delegated this authority to the undersigned EPA official. This proceeding is governed by the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits (“Consolidated Rules”) set forth at 40 C.F.R. part 22, a copy of which is enclosed.

2. All general allegations apply to and are incorporated in each of the findings set forth in this Proposed Administrative Order and Opportunity to Request a Hearing (Complaint) (“Order”). Attachment A, which further describes the violations alleged in this Order, is incorporated herein.

3. Continental Resources, Inc., at all times pertinent hereto, is a corporation organized under the laws of the State of Oklahoma, authorized to do business in the State of Montana.
4. Section 1421 of the Act, 42 U.S.C. § 300h, authorizes EPA to promulgate regulations for underground injection control (“UIC”) programs setting forth minimum requirements to prevent underground injection which endangers regulated drinking water sources. EPA has promulgated such regulations at 40 C.F.R. parts 124, 144, 146, 147, and 148.
5. Pursuant to section 1422(e) of the Act, 42 U.S.C. § 300h-1(e), and 40 C.F.R. § 147.1351, EPA administers the UIC Program for all Class II wells in Indian Country on the Fort Peck Reservation in the State of Montana as of May 11, 1987.
6. Pursuant to section 1423(c)(2) of the Act, 42 U.S.C. § 300h-2(c)(2), the Administrator may issue to any person subject to and in violation of any requirement of any applicable UIC program a civil penalty of not more than \$5,500 for each day of violation for any violation occurring prior to March 15, 2004 and not more than \$6,500 for each day of violation for any violation occurring on or after March 15, 2004, up to a maximum administrative penalty of \$157,500, or requiring compliance with such regulation, or both.
7. Continental Resources, Inc. (“Continental” or “Respondent”) is a "person" within the meaning of SDWA § 1401(12), 42 U.S.C. § 300f(12).
8. Class II injection wells defined at 40 C.F.R. § 144.3 and classified at 40 C.F.R. § 144.6(b) and 146.5(b) are wells used to emplace fluids underground (1) which have been brought to the surface in connection with oil and gas production (known as salt water disposal), or (2) for the purpose of enhancing oil recovery (known as enhanced recovery).

9. The applicable regulations for Class II wells are set forth at 40 C.F.R. parts 144 through 147.
10. Continental operates the following four Class II wells (Subject Wells), located on the Fort Peck Indian Reservation within the State of Montana, that are subject to this Order:

Henry Beier #B-2 SWD, EPA Permit No. MT20055-00067
 Effective 9/13/1985
 Lustre Field
 Salt Water Disposal Well
 T30N, R44E, Section 3, SW/4 of the SE/4
 Valley County, Montana,

Cranston, et.al. Well No. 1, EPA Permit No. MT20063-00080
 Effective 11/8/1985
 Lustre Field
 Salt Water Disposal Well
 T31N, R43E, Section 35, NE/4 of the SW/4 of the NE/4
 Valley County, Montana,

C. Reddig #1 SWD, EPA Permit No. MT20119-00424
 Effective 03/18/1987
 Lustre Field
 Salt Water Disposal Well
 T31N, R44E, Section 32, NW/4 of the SE/4 of the NW/4
 Valley County, Montana, and

Kenneth Dahl #1-8, EPA Permit No. MT20587-03549
 Effective 12/17/1991
 Midfork Field
 Salt Water Disposal Well
 T30N, R45E, Section 8, NW/4 of the SE/4 of the SW/4
 Valley County, Montana

FINDINGS

A. Annual Monitoring Reports

11. The UIC regulations at 40 C.F.R. § 146.23(b) require operators of Class II salt water disposal wells to, at a minimum, weekly observe injection pressure, flow rate and cumulative injection volume at each well and monthly record a value of each.
12. The UIC regulations at 40 C.F.R. § 146.23(c) require operators of all Class II wells to, at a minimum, annually report to EPA by February 15th of following year, the recorded values of injection pressure, flow rate and cumulative injection volume.
13. EPA UIC Permit No. MT20055-00067, EPA Permit No. MT20063-00080, EPA Permit No. MT20119-00424, and EPA Permit No. MT20587-03549 are EPA Permits for the Salt Water Disposal (SWD) wells described in paragraph 10 above. These SWD wells and permits are the subjects of this Order. The permits at part II(D)(1)(b), require the permittee (Continental) to observe and record values of injection pressure, annulus pressure, flow rate and cumulative injection volume at regular intervals no greater than monthly.
14. The four EPA UIC Permits identified in paragraph 13 above, each at Part II D.4., require the permittee (Continental) to annually report the required monitoring information by February 15th of the year following each reporting year.
15. Failure to report injection pressure, annulus pressure, flow rate and cumulative injection volume by February 15th of the year following each reporting year is a violation of 40 C.F.R. §§ 146.23(b) and (c) and EPA's UIC Permits listed in paragraph 13 above.

16. During the times identified in Attachment A, Part 1, Continental failed to comply with annual monitoring reporting requirements as set forth in the permits for the four subject Class II injection wells and therefore violated the Act.

B. Annual Fluid Samples

17. The UIC regulations at 40 C.F.R. § 146.23(b) require operators of all Class II injection wells to monitor the nature of the injected fluids at time intervals sufficiently frequent to yield data representative of their characteristics.
18. The UIC regulations at 40 C.F.R. § 146.23(c) require operators of all Class II injection wells to, at a minimum, annually report to EPA the results of fluid analysis monitoring.
19. The four EPA UIC Permits identified in paragraph 13 above, each at part II. D.1.(a), require the permittee (Continental) to analyze the injected fluids for total dissolved solids, pH, specific gravity and specific conductivity at least annually, or whenever there is a change in the source of the disposed fluids.
20. The four EPA UIC Permits identified in paragraph 13 above, each at part II.D.4., require the permittee (Continental) to annually report the fluid analysis monitoring information by February 15th of the year following each reporting year.
21. Failure to report analysis of the injected fluids by February 15th of the year following each reporting year is a violation of the regulations at 40 C.F.R. §§ 146.23(b) and (c) and the four EPA UIC Permits identified in paragraph 13 above.

22. During the times identified in Attachment A, Part 2, Continental failed to comply with annual fluid analysis reporting requirements in the permits for the four subject Class II injection wells and therefore violated the Act.

C. Injection Over the Maximum Injection Pressure

23. The four EPA UIC Permits identified in paragraph 13 above, each at Part II.C.4.(a), limit the injection pressure at which the permittee (Continental) may operate the well at. The maximum injection pressure measured at the surface is limited for each well to:

MT2055-00067 - 1875 psig
MT2063-00080 - 1000 psig
MT2119-00424 - 1000 psig
MT2587-03549 - 855 psig

Any increase or decrease to the injection pressure is to be specified by EPA in writing to Continental, only after Continental has done additional step-rate testing, and the results have been reviewed and approved by EPA.

24. During the times identified in Attachment A, Part 3, Continental injected into the wells at a pressure greater than the maximum allowed, as set by the permits for the four subject Class II injection wells, and therefore violated the Act.

D. Mechanical Integrity Testing

25. The UIC regulations at 40 C.F.R. § 146.23(b)(3) require operators of all Class II injection wells to demonstrate the wells' mechanical integrity, pursuant to 40 C.F.R. § 146.8, at least once every five years during the life of the injection well.
26. EPA UIC Permit No. MT20055-00067 (Henry Beier #B-2 well) at Part II. C.2. (a) and MT20587-03549 (Kenneth Dahl #1-8 well) at Part II. C.2.(b) require the permittee

(Continental) to demonstrate each well's mechanical integrity pursuant to 40 C.F.R. § 146.8 by passing a standard annulus pressure test at least every five years.

27. Failure to demonstrate each well's mechanical integrity at least every five years is a violation of the regulations at 40 C.F.R. §§ 146.23(b)(3) and EPA's UIC Permit Nos. MT20055-00067 and MT20587-03549.
28. During the times identified in Attachment A, Continental failed to comply with mechanical integrity demonstration requirements as set forth in the permits for UIC Permit Nos. MT20055-00067 and MT20587-03549 and therefore violated the Act.

E. False Reporting

29. Continental is not allowed to inject fluids underground or to operate the subject wells except in accordance with the conditions of the Continental Permit(s). The regulations at 40 C.F.R. § 144.51(a) and the four EPA UIC Permits identified in paragraph 13 above, at Part III.A.(Effect of Permit), Part III.E.1.(Duty to Comply), Part III E. 2. (Penalties for Violations of Permit Conditions) and Part III.E.6. (Duty to Provide Information) provide that Continental must comply with all conditions of the Continental Permit, that any noncompliance constitutes a violation of the SDWA and is grounds for enforcement action, permit termination, revocation and reissuance, or modification, and that any person who violates a permit requirement is subject to civil penalties, fines, and other enforcement action under the SDWA.
30. The four EPA UIC Permits identified above in paragraph 13, each at Part III.E.9., require that all reports or other information requested by EPA shall be signed and certified by

Continental, certifying that to the best of the signatory's knowledge and belief, such information is true, accurate, and complete.

31. Bob Betts, Manager OBO/SP Dept., R.L. McLaughlin, Dist. Production Engineer, Emily Buller, Production Dept. and Jody Kuberskey, Admin. Asst. SP Dept. signed and certified the Continental Annual Monitoring Reports for the years 1999 through 2003.
32. The UIC regulations at 40 C.F.R. §§ 146.23(b) and (c) require operators of Class II salt water disposal wells to, at a minimum, weekly observe injection pressure, flow rate, and cumulative injection volume at each well and monthly record a value of each; and to, at a minimum, annually report to EPA the recorded values of injection pressure, flow rate, and cumulative injection volume.
33. The Continental Permit(s) requires Continental to observe and record values of injection pressure, annulus pressure, flow rate, and cumulative injection volume at regular intervals no greater than monthly.
34. For the months reported by Continental and identified in Attachment A, Part 5, the information in the Annual Monitoring Reports was plainly not true, accurate, and complete.
35. EPA received two distinctly different Annual Monitoring Reports from Continental for the years 1999 and 2002 for the each of four permitted wells. The inconsistencies in the reports are listed in Attachment A, Part 5. Not only were the reports incongruous, but in Report 1, particularly for the year 2002, month after month (for two of the wells, almost for the entire year), identical entries were made and certified to be true, accurate and complete, regarding the maximum psig in a given month and the monthly average.

36. Failure to properly record and/or report required data is a violation of the Continental EPA UIC Permit(s) condition II.D.3. & 4. of the permits identified in paragraph 13 above and therefore a violation of the Act.
37. For the reporting years of 1999 and 2002, Continental failed to properly record and/or report monitoring information for the four subject wells and therefore violated the Act.

PROPOSED ORDER WITH ADMINISTRATIVE CIVIL PENALTY

38. Pursuant to section 1423(a) of the Act, 42 U.S.C. § 300h-2, and based on the foregoing findings, after taking into account: (1) Respondent's alleged violations are serious and a threat to human health and the environment; (2) Respondent gained an economic advantage over its competition by virtue of its late mechanical integrity demonstration and reporting violations; (3) EPA is unaware that Respondent has a history of violations such as these alleged in the complaint; (4) EPA is unaware of good faith efforts by Respondent to comply with applicable UIC regulations; (5) EPA has no basis to believe that the proposed penalty is one which would have a severe economic impact on Respondent; and (6) such other matters as justice may require, **EPA HEREBY**

ORDERS:

39. Respondent shall pay an administrative civil penalty (the "Penalty") in the amount of One hundred thirty-four thousand, six hundred dollars (**\$134,600**) for the violations of the UIC Program regulations described above. Payment must be made by money order or certified check made payable to "Treasurer, United States of America" and mailed no later than thirty (30) calendar days of Respondent's receipt of this Order to the following address:

EPA - Region 8
Regional Hearing Clerk
P.O. Box 360859
Pittsburgh, Pennsylvania 15251.

A copy of said check shall be mailed to the following address:

Jim Eppers (8ENF-L)
Enforcement Attorney
U.S. EPA - Region 8
999 18th Street, Suite 300
Denver, Colorado 80202-2466.

40. Respondent shall, no later than 30 calendar days after receipt of this Order, return to compliance the subject wells currently in violation. Respondent shall submit:
- a. Fluid analyses results for the years 1999, 2000, 2001, and 2003;
 - b. Mechanical integrity test results for the wells listed in paragraph 26 above;
 - c. Any well acidizing maintenance records for the wells that have injected over their permitted injection pressure; and
 - d. Field observation records for the injection pressures for the subject wells for the years 1999, 2001, 2002, and 2003.
41. Respondent shall, no later than 30 calendar days after receipt of this Order, develop compliance procedures to ensure all its UIC Class II injection wells remain in compliance with all applicable regulatory and permit requirements, and submit said compliance procedures to EPA in accordance with paragraph 40 above. The procedures must include, at a minimum, communication among different levels of Respondent's employees and contractors, communication with EPA and the Assiniboine & Sioux Tribes, posting signs at wellheads as a reminder of operating requirements, and a methodology for ensuring timely and complete reporting, routine and otherwise.
42. Respondent shall submit all reports and compliance procedures to:

Carol Bowden (8ENF-UFO)
U.S. EPA Region 8
999 18th Street, Suite 300
Denver, CO 80202-2466.

NOTICE OF OPPORTUNITY TO REQUEST A HEARING

43. Under section 1423(c)(3)(A) of the Act, 42 U.S.C. § 300h-2(c)(3)(A), Respondent may request, within thirty (30) days of receiving this Order, a hearing on this matter. Such request (also referred to as “Answer” and defined in 40 C.F.R. § 22.15) must be made in writing and must specify the factual and legal issues in dispute and the specific factual and legal grounds for Respondent’s defense(s). At the hearing, Respondent may contest any material fact set forth herein and the propriety of the proposed penalty and/or compliance requirements described above. The procedures for a hearing, if one is requested, are set out in 40 C.F.R. part 22, Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination, or Suspension of Permits, Rule dated July 23, 1999 64 Federal Register 141, a copy of which is enclosed with this Order. If Respondent does not request a hearing, EPA may finalize this Order, thereby requiring compliance and assessing the full penalty proposed above.

44. Respondent must send any request for a hearing to:

Tina Artemis
Regional Hearing Clerk
U.S. EPA Region 8, 8RC
999 18th Street, Suite 300
Denver, Colorado 80202-2466.

45. Respondent may confer informally with EPA concerning the alleged violations or the amount of the proposed penalty regardless of whether Respondent requests a hearing.

Respondent may be represented by counsel at the informal conference. If a settlement is reached, it will be formalized in a document entitled Consent Agreement and finalized by the issuance of a Final Order by the Regional Judicial Officer. If Respondent wishes to confer informally with EPA, please contact Jim Eppers, Enforcement Attorney, at (303) 312-6893.

46. Respondent is advised that EPA is required to notify the public about this action, and that members of the public have a right under section 1423(c)(3)(B) of the Act, 42 U.S.C. § 300h-2(c)(3)(B), to comment on this matter. Those members of the public who comment will also have the right to present evidence and be heard at any hearing on this matter.
47. EPA will review any comments submitted on the Order and will thereafter determine whether to modify or withdraw the Order or whether to adjust the proposed penalty.

GENERAL PROVISIONS

48. This Order does not constitute a waiver, suspension, or modification of the requirements of EPA UIC Permits No. MT20055-00067, MT20063-00080, MT20119-00424, and MT20587-03549, or 40 C.F.R. parts 144, 146, 147, or any other applicable provision of the Act or the UIC regulations implementing the Act, which remain in full force and effect. Issuance of this Order is not an election by the EPA to forego any civil or any criminal action otherwise authorized under the Act.
49. The provisions of this Order shall apply to and be binding upon Respondent and its respective officers, directors, agents, successors or assigns.
50. Violation of the terms of this Order may subject Respondent to further enforcement action pursuant to section 1423(b) of the Act.

Issued this **28TH** day of **September**, 2004.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY, REGION 8
Complainant.

Michael T. Risner
Carol Rushin
Assistant Regional Administrator
Office of Enforcement, Compliance
and Environmental Justice

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original and one copy of the attached PROPOSED ADMINISTRATIVE ORDER AND OPPORTUNITY TO REQUEST A HEARING (COMPLAINT) were hand-carried to the Regional Hearing Clerk, EPA Region 8, 999 18th Street, Denver, Colorado, and that a true copy of same was sent via Certified Mail, Return Receipt Requested, to:

C T Corporation System
Registered Agent for Continental Resources, Inc.
40 W. Lawrence - Suite A
P.O. Box 1166
Helena, MT 59624

and a true copy of same was sent via regular U.S. Mail, to:

Harold Hamm
President, Continental Resources, Inc.
302 N. Independence St. Suite 206
P.O. Box 1032
Enid, Oklahoma 73701

9/28/04
Date

SIGNED
Judith McTernan

**PROPOSED ADMINISTRATIVE ORDER ATTACHMENT A
CONTINENTAL RESOURCES, INC.**

Wells

MT2587-03549 Kenneth Dahl 1-8
 MT2119-00424 C. Reddig 1
 MT2063-00080 Cranston, et.al. 1
 MT2055-00067 Henry Beier "B" 2

PART 1. Annual Monitoring Report (AMR)

Reports are due 2/15 annually. Some years EPA received two, with different pressures reported.

Dates Received

Well Number	1999 AMR	2000 AMR	2001 AMR On Time	2002 AMR	2003 AMR
MT2055-00067	2/9/00 2/25/00	3/27/01	2/13/02	5/16/03 9/3/03	3/8/04
MT2063-00080	2/9/00 2/25/00	3/27/01	2/13/02	5/16/03 9/3/03	3/8/04
MT2119-00424	2/9/00 2/25/00	3/27/01	2/13/02	5/16/03 9/3/03	3/8/04
MT2587-03549	2/9/00 9/24/00	3/27/01	2/13/02	5/16/03 9/3/03	3/8/04

Part 2. Missing and Late Fluid Analysis

Fluid analysis are due annually with the AMRs. Only one fluid analysis has been received for each of the four (4) wells and it followed a Notice of Noncompliance from EPA (dated 5/9/03). This 2002 Fluid Analysis Report was received by EPA on 6/5/2003. No Fluid Analysis Reports for any of the wells were received for the years 1999, 2000, 2001, and 2003. These reports were due annually on February 15 of the following year.

Part 3. Injection Over Pressure

MT2063-00080 Maximum Authorized Injection Pressure (MAIP) - 1000 psig

The following are reported pressures over the MAIP.

September 02 - 1050 psi
 March 03 - 1200 psi
 August 03 - 1300 psi

MT2119-00424 MAIP - 1000 psig

The following are reported pressures over the MAIP.

January 02 - 1050 psi
 February 02 - 1050
 April 02 - 1050
 June 02 - 1150
 July 02 - 1150
 August 02 - 1150
 September 02 - 1150
 October 02 - 1200
 November 02 - 1150
 December 02 - 1100
 January 03 - 1400
 February 03 - 1200
 March 03 - 1200
 April 03 - 1200
 May 03 - 1200
 June 03 - 1200
 July 03 - 1300
 August 03 - 1250
 September 03 - 1150
 November 03 - 1050
 December 03 - 1050

MT2587-03549 MAIP - 855 psig

The following are reported pressures over the MAIP.

January 01 - 900
 August 01 - 900
 September 01 - 980
 November 01 - 900
 December 01 - 975
 January 02 - 875
 February 02 - 875

4. Late Mechanical Integrity Test (MITs)

- A. MT2055-00067 Henry Beier "B" 2
 Last MIT Record dated 7/16/97

MIT was required by **7/16/2002**, but no record of a MIT has been received by EPA

B. MT2587-03549 Kenneth Dahl 1-8

Last MIT Record dated 1/16/97

MIT was required by **1/16/2002**, but no record of a MIT has been received by EPA

5. Reporting False/Incorrect Information

For two reporting years, 1999 and 2002, EPA received 2 annual monitoring reports (AMRs) from Continental for each well. The information reported was inconsistent and therefore incorrect for each of those two years. Additionally, the fact that entries in Report 1 were identical month after month indicates that the AMRs were falsely reported:

For the 1999 Reporting - Report 1 was received by EPA February 9, 2000
 - Report 2 was received by EPA February 25, 2000

For the 2002 Reporting - Report 1 was received by EPA May 16, 2003
 - Report 2 was received by EPA September 3, 2003

ALL BOLDDED NUMBERS SHOW INCONSISTENCY BETWEEN THE REPORTS

	Report 1 Max psig	Report 1 Ave. psig	Report 2 Max. psig	Report 2 Ave. psig
WELL MT2055-00067				
1999 AMR				
May	600	40	600	29
July	280	83	280	86
August	200	116	200	120
October	200	110	200	107
December	300	239	300	255
2002 AMR				
January	350	300	350	223
February	350	320	350	193

	Report 1 Max psig	Report 1 Ave. psig	Report 2 Max. psig	Report 2 Ave. psig
March	350	320	425	175
April	350	300	425	175
May	350	300	400	264
June	350	310	375	134
July	350	310	400	274
August	360	330	400	160
September	350	325	425	228
October	350	325	400	178
November	350	320	400	167
December	350	320	600	207
WELL MT2063-00080				
1999 AMR				
February	450	218	450	216
March	600	252	600	253
May	600	335	600	360
August	600	419	600	433
October	680	435	680	436
December	600	329	680	448
2002 AMR				
January	650	650	510	600
February	640	650	516	700
March	640	650	510	625
April	640	650	535	650
May	650	650	525	700
June	650	650	535	650

	Report 1 Max psig	Report 1 Ave. psig	Report 2 Max. psig	Report 2 Ave. psig
July	650	650	521	650
August	650	650	529	700
September	650	650	558	1050
October	650	650	520	700
November	650	650	527	700
December	650	650	610	700
WELL MT2119-00424				
1999 AMR				
February	950	528	950	529
March	950	516	950	502
May	400	39	400	40
2002 AMR				
January	900	875	1050	652
February	900	850	1050	461
March	900	880	1000	583
April	900	880	1050	585
May	900	890	700	525
June	900	900	1150	796
July	900	880	1150	780
August	900	880	1150	748
September	900	880	1150	915
October	900	900	1200	827
November	900	880	1150	790
December	900	880	1100	648

	Report 1 Max psig	Report 1 Ave. psig	Report 2 Max. psig	Report 2 Ave. psig
Well MT2587-03549				
1999 AMR				
March	800	77	800	53
May	800	77	800	60
July	650	21	650	22
August	600	77	600	80
October	750	105	750	85
December	800	235	800	180
2002 AMR				
January	850	810	875	580
February	850	830	875	580
March	850	835	850	566
April	850	830	650	432
May	850	825	650	275
June	850	830	650	345
July	850	835	625	367
August	850	850	625	369
September	850	840	625	274
October	850	835	650	351
November	850	835	625	465
December	850	835	625	353

**IF YOU WOULD LIKE COPIES OF THE ADDITIONAL ATTACHMENTS, PLEASE
CONTACT THE REGIONAL HEARING CLERK.**

THIS DOCUMENT WAS FILED IN THE RHC'S OFFICE ON SEPTEMBER 28, 2004.